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DVH Hospital Alliance, LLC and
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware
Limited Liability company, DVH HOSPITAL
ALLIANCE, LLC, a Delaware Limited Liability
company, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC, a Delaware Limited
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESellschaft, a Foreign
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**PLAINTIFF'S LOCAL RULE IA 6-1.
MOTION FOR ENLARGEMENT OF
TIME TO EFFECTUATE SERVICE**

COME NOW, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and
Summerlin Hospital Medical Center, LLC, (collectively, "Plaintiffs"), by and through their

undersigned counsel, and, pursuant to Local Rule 6-1 hereby move this Honorable Court for an enlargement of time for an additional sixty (60) days through and including March 24, 2023 within which to effectuate service of the Summons, Complaint and Standing Order upon Defendant, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, and state as follows:

1. Since the filing of the Complaint, the Plaintiff has attempted to obtain Article 5 service of the Summons, Amended Complaint and Standing Order on Defendant, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation (“TIF”), through the Hague Convention.

2. The undersigned is making another attempt at serving the Defendant, TIF after obtaining a new summons removing Jonathon Phillips as the representative for Defendant, TIF. The undersigned spoke with a representative at The Senior Master Queens Bench in the United Kingdom and was advised that our Summons, Amended Complaint and Standing Order was received on January 10, 2023 by the Royal Courts of Justice for service through Article 5 of the Hague Convention.

3. The undersigned has been advised that there is a backlog and that they are currently processing requests for service received on October 12, 2022 and that due to the backlog, they do not know when they will process Plaintiff’s request for service of process on TIF.

4. While Fed.R.Civ.P. 4(m) requires service within 90 days after filing of a Complaint, subdivision (m) does not apply to service in a foreign country under [Rule 4\(f\)](#) or [4\(h\)\(2\)](#), the provisions under which the Plaintiff is attempting to obtain service on the Defendants in this action.

5. Nevertheless, in an abundance of caution and in the interests of judicial economy, the Plaintiff requests an additional sixty (60) days to obtain service of the Summons and Amended Complaint upon the Defendant, TIF and respectfully requests this Honorable Court enter its Order enlarging the time to effectuate service accordingly.

6. This Motion is made in good faith and not for the purposes of harassment or delay.

7. The undersigned has contacted counsel for the Defendant has no objection to the filing of this Motion or the relief sought herein.

WHEREFORE, for the foregoing reasons, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC, respectfully request an

1 additional sixty (60) days through and including March 24, 2023, in which to effectuate service of
2 Summons and Amended Complaint upon the Defendant, TIF as aforesaid and for such other and
3 further relief as the Court deems appropriate.

4 DATED this 19th day of January, 2023.

5 **WILEY PETERSEN**

6 */s/ Jason M. Wiley*

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28 *Systems, LLC, DVH Hospital*
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Hospital Medical Center, LLC

21 Having reviewed Plaintiffs' motion, the Court finds good cause to extend the time for
22 service.

23 **IT IS THEREFORE ORDERED** that Plaintiffs' motion for an extension of time (ECF
24 No. 48) is **GRANTED**. Plaintiffs shall have until **March 24, 2023** to effectuate service
25 on Defendant Travel Insurance Facilities, PLC.

26 
27 DANIEL J. ALBREGTS
28 UNITED STATES MAGISTRATE JUDGE

DATED: January 20, 2023

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Hartley Law Offices, PLC, and that on the 19th day of January, 2023, I caused to be served a true and correct copy of the foregoing **PLAINTIFF'S LOCAL RULE IA 6-1. MOTION FOR ENLARGEMENT OF TIME TO EFFECTUATE SERVICE** in the following manner:

(ELECTRONIC SERVICE) Pursuant to Rule 5-4 of the Local Rules of Civil Practice of the United States District Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written.

(ELECTRONIC E-MAIL)

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